

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

---

MARY HEATHER MCAFEE,

Plaintiff,

v.

SYNCHRONY FINANCIAL; TRANS  
UNION, LLC; EXPERIAN INFORMATION  
SOLUTIONS, INC.; and EQUIFAX  
INFORMATION SERVICES, LLC,

Defendant.

---

:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:  
:

Civil Action No.: 3:22-cv-261

**SYNCHRONY BANK’S CONSENT MOTION FOR SUBSTITUTION OF PARTY AND  
FOR LEAVE TO FILE ANSWER OUT OF TIME**

Synchrony Bank (“Synchrony”) (incorrectly named as “Synchrony Financial”), with the consent of Plaintiff’s counsel, moves this Court to grant an Order substituting Synchrony as Defendant in this case in place of the original named Defendant, pursuant to Federal Rule of Civil Procedure 21. Synchrony further moves this Court to grant an Order affording Synchrony leave to file an Answer out of time, for reasons detailed in the contemporaneously-filed memorandum.

Dated: May 27, 2022

Respectfully submitted:

/s/ Alison Ross Ellis

Alison Ross Ellis (VSB No. 75564)

Reed Smith LLP

Riverfront Plaza – West Tower

901 E. Byrd Street, Suite 1900

Richmond, VA 23219-4068

Telephone: (804) 344-3400

Facsimile: (804) 344-3410

aellis@reedsmith.com

*Counsel for Defendant Synchrony Bank*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of May, 2022, I have electronically filed the foregoing using the CM/ECF system, which will automatically send e-mail notification of such filing to all counsel of record as follows:

Kristi Cahoon Kelly  
Kelly Guzzo PLC  
3925 Chain Bridge Road Suite 202  
Fairfax, VA 22030  
703-424-7570  
Fax: 703-591-9285  
Email:Kkelly@kellyguzzo.Com

Andrew Joseph Guzzo  
Kelly Guzzo PLC  
3925 Chain Bridge Road Suite 202  
Fairfax, VA 22030  
703-424-7576  
Fax: 703-591-0167  
Email:Aguzzo@kellyguzzo.Com

Casey Shannon Nash  
Kelly Guzzo PLC  
3925 Chain Bridge Road Suite 202  
Fairfax, VA 22030  
703-424-7571  
Fax: 703-591-0167  
Email:Casey@kellyguzzo.Com

James Patrick McNichol  
Kelly Guzzo PLC  
3925 Chain Bridge Road Suite 202  
Fairfax, VA 22030  
703-424-7573  
Email:Pat@kellyguzzo.Com

*Attorneys for Plaintiff*

David Neal Anthony  
Troutman Pepper Hamilton Sanders LLP (Richmond)  
Troutman Sanders Bldg 1001 Haxall Point Po Box 1122  
Richmond, VA 23219  
804-697-5410

Fax: 804-698-5118

Email:David.Anthony@troutman.Com

*Attorney for Defendant Experian Information Solutions, Inc.*

John Willard Montgomery, Jr.

Traylor Montgomery & Elliott PC

130 E Wythe St

Petersburg, VA 23803

804-861-1122

Fax: 804-733-6022

Email:Jmontgomery@tmande.Com

*Attorney for Defendant Equifax Information Services, Inc.*

/s/ Alison Ross Ellis

Alison Ross Ellis (VSB No. 75564)

REED SMITH LLP

Riverfront Plaza – West Tower

901 East Byrd Street, Suite 1900

Richmond, Virginia 23219

Telephone: (804) 344-3400

Facsimile: (804) 344-3410

[aellis@reedsmith.com](mailto:aellis@reedsmith.com)

*Attorney for Synchrony Bank*